

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: ROBERT HUGH ADAMS, JR.  
AKA BOBBY H. ADAMS, JR. AND  
JAN BAKER ADAMS, DEBTOR

CHAPTER 13 PROCEEDING

CASE NO. 13-12902-JDW

**RESPONSE TO THE DEBTOR'S MOTION FOR APPROVAL OF CONTRACT  
TO SELL REAL PROPERTY**

COMES NOW, Nationstar Mortgage LLC, hereinafter also referred to as Creditor, a secured creditor under 11 U.S.C. § 506 (a) & (b), in the above entitled Bankruptcy proceeding, by and through its attorney, and hereby submits the following response to the Motion for Approval of Contract to Sell Real Property filed by Debtor, to wit:

1. That on or about July 20, 2005, Robert Hugh Adams, Jr., and Jan Baker Adams, husband and wife, did execute a certain Note and Deed of Trust in favor of Mortgage Electronic Registration Systems, Inc., as nominee for Patriot Bank, its successors and assigns and secured by the following real property:

Lot 33, Sandidge Point Subdivision, situated in Section 3, Township 2 South, Range 6 West, DeSoto County, Mississippi as per plat thereof recorded in Book 86, Pages 27-28, in the Chancery Clerk's Office of DeSoto County, MS.

Said Deed of Trust is recorded in the DeSoto County Chancery Clerk's office in Book 2,264 at Page 24. Further, said Note and Deed of Trust were subsequently assigned to Plaintiff by assignment recorded in the office of the Chancery Clerk aforesaid.

2. An Order [dkt. 66] was entered January 22, 2018, granting the motion for relief from stay, and allowing the subject property to be abandoned from the bankruptcy estate pursuant to 11 U.S.C. §554(b).

3. The approximate payoff amount due to Nationstar Mortgage, LLC is \$129,448.54.

An updated payoff quote is being generated, and can be provided to the Debtor.

4. Creditor does not oppose the sale of the proposed property, so long as the amount owed to Nationstar Mortgage LLC is paid in full, prior to any other fees and costs, and that the Debtor contacts Nationstar Mortgage LLC prior to the sale, and obtains both an updated payoff quote, and specific information concerning the transmittal of funds directly to Nationstar Mortgage LLC

Respectfully submitted, this the 21<sup>st</sup> day of February, 2018.

Respectfully submitted  
SHAPIRO & MASSEY, LLC

/s/ Laura Henderson-Courtney  
Laura Henderson-Courtney  
Attorney for Creditor

**CERTIFICATE OF SERVICE**

I, Laura Henderson-Courtney, of the firm of Shapiro & Massey, LLC, do hereby certify that I have this date provided a copy of the foregoing Response to the Debtor's Motion for Approval of Contract to Sell Real Property either by electronic case filing or by United States mail postage pre-paid to the following:

Locke D. Barkley, Chapter 13 Trustee  
[sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

Tracy B. Walsh, Attorney for Debtor  
[tbwalsh@walshlawfirmpllc.com](mailto:tbwalsh@walshlawfirmpllc.com)

Office of the U.S. Trustee  
[USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Robert Hugh Adams, Jr. aka Bobby H. Adams, Jr. and Jan Baker Adams  
5942 Stonewall Drive  
Olive Branch, MS 38654

Dated: February 21, 2018

Respectfully submitted  
SHAPIRO & MASSEY, LLC

/s/ Laura Henderson-Courtney  
Laura Henderson-Courtney  
Attorney for Creditor

Presented by:  
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